

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

DANIEL MICHAELS,

Plaintiff,

v.

Case No. 1:21-cv-00764-PJK-JFR

AAT TRUCKING, LLC and JUAN DURAN,

Defendants.

JOINT MOTION TO DISMISS PLAINTIFF'S CLAIMS WITH PREJUDICE

Daniel Michaels (“Plaintiff”) and AAT Trucking, LLC, and Juan Duran (collectively, “Defendants”), by and through their respective counsel of record, respectfully file their Joint Motion to Dismiss Plaintiff’s Claims with Prejudice as follows:

1. Plaintiff filed suit against Defendants on July 14, 2021.
2. The Parties agree dismissal with prejudice of all of Plaintiff’s claims against AAT Trucking, LLC, and Juan Duran in this case is warranted, with the parties to bear their respective costs.

Accordingly, DANIEL MICHAELS, AAT TRUCKING, LLC, and JUAN DURAN respectfully request the Court to grant this Joint Motion to Dismiss with Prejudice all claims of DANIEL MICHAELS against AAT TRUCKING, LLC, and JUAN DURAN.

Respectfully submitted,

LAW OFFICE OF ERIKA E. ANDERSON
105 Bryn Mawr Dr., SE
Albuquerque, NM 87106
Phone: (505) 944-9039

By: /s/ Erika E. Anderson
ERIKA E. ANDERSON
erika@eandersonlaw.com
WILL LUSK-CLAIRBORN
will@eandersonlaw.com

Attorneys for Plaintiff

-and-

RINCON LAW GROUP, P.C.
1014 N. Mesa, Suite 200
El Paso, Texas 79902
(915) 532-6800 (Telephone)
(915) 532-6808 (Facsimile)

By: /s/ Yosef W. Abraham
CARLOS RINCON
CRincon@rinconlawgroup.com
YOSEF W. ABRAHAM
YAbraham@rinconlawgroup.com

Attorneys for AAT Trucking, LLC, and
Juan Duran

CERTIFICATE OF SERVICE

I certify a true and correct copy of the foregoing document was filed via CM/ECF, thereby causing it to be served on the parties through their counsel of record on this 4th day of March 2022.

/s/ Yosef W. Abraham
YOSEF W. ABRAHAM